

From: [Fortenberry, Chase](#)
To: [Saric, James](#)
Cc: [Wood, Nicole](#); BUCHOLTZP@michigan.gov; SynkP@michigan.gov; [Davis, Michael \(GP Law\)](#); [Lathrop, Alison J. \(GP LAW\)](#); [Griffith, Garry T.](#); [Massengill, Dave G.](#); [Garret Bondy](#)
Subject: April 3rd Meeting Summary and Proposed Conference Call
Date: Friday, April 12, 2013 1:27:25 PM
Attachments: [April 3rd, 2013 Chicago Meeting Summary - Area 1 FS Comments - 041213.pdf](#)

Jim,

The attached letter documents Georgia-Pacific's understanding of the discussions we had during our meeting in Chicago last week. Please let us know if it is alignment with your takeaways from the meeting.

We would also like to propose a follow up conference call to discuss several additional comments that we were not able to get to during the meeting. In an effort to capitalize on our remaining time, I suggest we schedule this as early next week as possible.

Please let us know your availability for a call.

Thanks,

L. Chase Fortenberry, P.G.

Manager - Environmental Engineering
Georgia-Pacific LLC
133 Peachtree St., NE
Atlanta, GA 30303
Office #: (404) 652-6166
Mobile #: (404) 539-3509
lcforten@gapac.com

April 12, 2013

Mr. James Saric
Remedial Project Manager
USEPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3511

Subject: April 3, 2013 Meeting Summary

Dear Mr. Saric:

Georgia-Pacific appreciates USEPA's and MDEQ's time to meet with us in Chicago on April 3, 2013 to discuss USEPA's February 5, 2013 comments and MDEQ's February 15, 2013 comments on the draft Area 1 FS. We found the discussion helpful in clarifying the intent on a number of the comments and want to confirm our understanding of what we consider the main clarifications.

1. We were concerned with EPA's requested revision to Remedial Action Objective (RAO) 1 as stated in EPA's General Comment # 8. As we discussed, Georgia-Pacific is concerned that some of the proposed targets for RAO 1 are not attainable for the foreseeable future, and the inclusion of time targets – one of the nine FS alternative evaluation criteria – has the potential to bias the alternative evaluation process. We understand that EPA is willing to reconsider whether the FS is the appropriate place to have specific time targets as an RAO.
2. We agreed with the use of a 100 percent smallmouth bass diet for establishing fish targets but believe the use of the central tendency sport angler consumption rate is more appropriate than the high-end sport angler for the Kalamazoo River Site. Risk estimates for a central tendency sport angler fish consumer using non-cancer (HI=1.0) and cancer risk thresholds (10^{-5}) for acceptable risk are consistent with the Michigan fish advisory level for one meal per week for smallmouth bass, and this target appears to be achievable compared to current fish concentrations measured in Morrow Lake. This approach is also consistent with the MDEQ draft statewide PCB TMDL, which recognizes the impact of atmospheric deposition. We understand that EPA is going to review this issue and determine if the central tendency sport angler is the appropriate population.
3. EPA clarified that it is not rejecting use of the 0.33 mg/kg sediment remedial goal as referenced in General Comment #9, but that Georgia-Pacific needs to provide additional information supporting this remedial goal.
4. EPA is agreeable to use of the stream tube method for SWAC calculation, but wants step out samples not to be included. EPA is interested in using the same method to calculate SWACs in all areas. To date Georgia-Pacific has used several methods for calculating SWACs in the Area 1 and 2 SRI reports in an attempt to use as much of the data as possible and would like to continue discussions with EPA to use the data, while satisfying concerns regarding sampling bias. The goal of using one method for calculating SWACs in all portions of all areas may not be possible since the data set includes data collected through a variety of sampling plans/objectives by numerous agencies/companies over the 20 year plus RI period. We understand that EPA agrees that the FS may present a range of SWAC values for certain areas / subareas to demonstrate the variability in SWACs and will work with Georgia-Pacific in an effort to calculate the most appropriate SWAC.

5. EPA clarified that Georgia-Pacific should include additional information in the FS to quantify PCB contributions from bank erosion from the former Plainwell impoundment and Plainwell No. 2 Dam Area as requested in General Comment #11.
6. EPA clarified that Georgia-Pacific will need to try and identify residential areas located in the floodplain for the purpose of risk assessment as stated in General Comment 2 and elsewhere in the comments. As this was not part of the SRI scope, EPA agreed to work with us in terms of defining the areas of concern as we could not locate FEMA floodplain maps for the cities of Plainwell and Otsego when the Land Use Assessment was prepared for Area 1 and 2 SRI reports.

Georgia-Pacific wants to insure that we correctly interpreted the results of our meeting last week, please let us know if we have misstated any of these understandings.

In addition to the above items, we would like to propose a short conference call to discuss several additional comment items that we were not able to discuss during the Chicago meeting. Since time is of the essence, Georgia-Pacific proposes to have this call early next week. Please let us know your availability.

Georgia-Pacific looks forward to working with you and MDEQ to finalize the Area 1 FS.

Sincerely,



L. Chase Fortenberry
Manager-Environmental Engineering, Environmental Affairs
Georgia-Pacific, LLC

cc: Nicole Wood, Esq., USEPA
Paul Bucholtz, MDEQ
Polly Synk, Esq., Michigan Department of Attorney General
J. Michael Davis, Esq., Georgia-Pacific LLC
Alison Lathrop, Esq., Georgia-Pacific LLC
Garry Griffith, Georgia-Pacific LLC
David G. Massengill, Georgia-Pacific LLC
Garrett Bondy, P.E., AMEC